

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DOUGLAS GILSTRAP and MYRON TATARYN,  
each on behalf of himself and all others similarly situated,

Plaintiffs,

vs.

05- CV- 7947 (PKC)

RADIANZ LTD., RADIANZ AMERICAS, INC.,  
REUTERS LIMITED, BLAXMILL (SIX)  
LIMITED, REUTERS C LLC,  
REUTERS AMERICA LLC, and  
BRITISH TELECOMMUNICATIONS plc,  
Defendants.

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DOUGLAS GILSTRAP, BRIAN DILLON  
and JOHN MADIGAN,  
Plaintiffs,

vs.

06-CV-14218 (PKC)

RADIANZ LTD. and RADIANZ AMERICAS, INC.,  
Defendants.

**AFFIDAVIT OF JASON P. FULTON IN SUPPORT OF  
PLAINTIFFS RESPONSE TO ORDER TO SHOW CAUSE**

JASON P. FULTON, being duly sworn, makes this Affidavit and states the following:

1. My name is Jason P. Fulton. I am over the age of twenty-one (21) years, am competent to testify to the matters stated herein, have personal knowledge of the facts and statements in this affidavit, and each of the facts and statements is true and correct.


2. I am an attorney admitted to practice pro hac vice before this Court and an attorney of Susman Godfrey L.L.P., attorneys for Plaintiffs Douglas Gilstrap, Myron Tataryn, Brian Dillon and John Madigan (collectively, "Plaintiffs").

3. I submit the following list of exhibits cited in Plaintiffs' Response To The Order To Show Cause. A true and correct copy of each document is attached hereto.

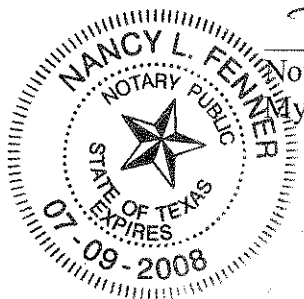
Exhibit    Description


- A       Request for Pre-Motion Conference Letter to the Court, from Stephen D. Susman, dated August 16, 2006, and filed August 21, 2006
- B       Letter to the Court, Judge Castel, from Richard Rothman, dated August 21, 2006
- C       Letter to the Court, Judge Castel, from Stephen D. Susman, dated August 29, 2006, and filed August 30, 2006
- D       Stipulation and Order, *Gilstrap, et al. v. Radianz, Ltd., et al.*, Case No. 06-CV-14218; (S.D.N.Y.) (PKC), filed January 5, 2007
- E       Letter to the Court, Judge Castel, from Richard A. Rothman, dated July 16, 2007, and filed August 13, 2007
- F       Civil Docket Sheet, Case No. 1:06-CV-14218-PKC, dated September 27, 2007
- G       Letter to Richard A. Rothman, from Stephen D. Susman, dated July 31, 2007

FURTHER, AFFIANT SAITH NOT.

  
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JASON P. FULTON

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, by Jason P. Fulton, on this 28<sup>th</sup> day of September, 2007, to certify which witness my hand and seal of office.



  
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Notary Public in and for the State of Texas  
My Commission Expires: 7-9-2008